

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re PEGASYSTEMS INC. SECURITIES)
LITIGATION)
_____)

Case No.: 1:22-cv-11220-WGY

**DECLARATION OF DANIEL W. HALSTON IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL**

I, Daniel W. Halston, hereby state as follows:

1. I am a partner with the firm Wilmer Cutler Pickering Hale and Dorr LLP and counsel for Pegasystems Inc. ("Pega") and Alan Trefler in the above-captioned matter. I am an attorney licensed to practice in the Commonwealth of Massachusetts. I am over the age of eighteen and have personal knowledge of, and am competent to testify about, the factual matters asserted herein. If called as a witness, I could and would competently testify thereto. I submit this Declaration in support of Defendants' Opposition to Lead Plaintiffs' Motion to Compel.

2. Attached as Exhibit A is a true and correct copy of the letter sent by Defendants to Plaintiffs on October 16, 2023 concerning, among other things, Plaintiffs' Request for Production No. 5.

3. Attached as Exhibit B is a true and correct copy of an excerpt of Pega's Form 10-Q for the Quarterly Period Ended September 30, 2023, filed with the SEC on October 25, 2023.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of December, 2023, in Boston, Massachusetts.

/s/ Daniel W. Halston
Daniel W. Halston